

## REMARKS

Applicants wish to thank Examiner James A. Thompson for having considered this application with care.

### Section 102 rejection

In the Official Action it is said that most of the claims are anticipated by the patent to Kinichiro Ohno. More particularly it is asserted that Ohno teaches (emphasis added) :

"apparatus (figure 1 of Ohno) for printing a desired image . . . based upon image data, by construction from individual marks formed in a pixel grid (column 6, lines 29-31 of Ohno)."

With respect, this assertion is factually in error, as the title and abstract of Ohno's patent immediately make clear. Ohno's device does not print images "based upon image data" at all, but rather by rotation of cylinders that carry offset lithographic plates on which desired shapes have been formed photochemically.

In fact Ohno's cited Fig. 1 is not even a diagram of apparatus for printing. Rather it is a diagram of his automatic system for controlling registration among his several different cylinders, with their respective different ink colors.

Furthermore the plates do not print "by construction from individual marks formed in a pixel grid". Rather Ohno's offset plates carry (and transfer to printing paper) entire ima-

ges in just one single unitary step, at each rotation of the rotary cylinders.

Nevertheless it is also said in the Official Action that Ohno's apparatus (emphasis added) —

"comprises at least one multielement incremental-printing array (figure 2[11] and column 4, lines 29-30 of Ohno) . . . ."

These statements too, with greatest respect, are mistaken. The rotary plates 11 in Ohno's Fig. 2 are not at all multielement arrays, but each is a single unitary plate that carries one respective ink of a particular color.

It is true that each one of the Applicants' "multielement arrays" forms its respective image in a different respective single colorant; and that each of Ohno's cylinder/plate combinations likewise forms its respective image in a different respective colorant. This aspect of printing, however, is common to virtually all printing devices, even including letterpress as well as offset — that is, different colors of ink are laid down by different subsystems or in separate process steps. It would be meaningless to confuse the different color-plane-forming devices used in diverse printing systems with the multiple different printing elements used for each color plane in incremental printing.

Each of the Applicants' single-colorant subsystems once again is a multielement array of elements. Each of Ohno's single-colorant subsystems, by contrast is an individual, single element.

Furthermore it is not true, as asserted in the Action, that Ohno teaches an "incremental" printing apparatus. His overall printing system does not print incrementally at all, but rather forms an entire unitary image at each rotation of

his plate-bearing cylinders. This is in the fundamental nature of a rotary offset press.

Coming now to the specific text passages cited in the above-quoted excerpts from the Official Action, Ohno's first-excerpted passage at column 6, lines 29 through 31, is cited in support of the assertion that Ohno's device prints "a desired image . . . based upon image data, by construction from individual marks formed in a pixel grid".

Very much to the contrary, that passage actually discusses "a CCD camera for photographing an image of register marks" — i. e. marks that are merely used for alignment of the plural individual-colorant images. These marks are not "a desired image" and certainly are not printed "by construction from individual marks formed in a pixel grid".

Slightly farther down in the same column, at lines 43 through 50, it is made particularly clear that the registration marks are distinct from anything like "a desired image". Ohno there explicitly says that it is important to "discriminate the register marks from the background color"; it is the latter "background color" that is in the nature of a "desired image", i. e. one to be printed for esthetic enjoyment, or for commercial communications, etc.

Similarly, Ohno's passage at column 4, lines 29 and 30 is cited in support of the idea that Ohno teaches "at least one multielement incremental-printing array". What the passage actually says is, in substance, to the contrary: namely that Ohno's Fig. 2 illustrates "a multi-color rotary press".

Thus, the Ohno patent is in an entirely different field from that of the present invention. The field of the Applicants' invention is incremental printing, as set forth clearly in the introductory passages of the specification, but most particularly at page 2, lines 12 through 30. Ohno's rotary-

offset press technology is precisely diametrical to incremental printing.

Thus the Ohno patent is nonanalogous art, not properly citable against Applicant's claims and also not properly combinable with the other cited patents. It would therefore be cumulative to take up all the other details of the rejected claims — which are even more remote, far more remote, than the subject matter of Applicants' base claims taken up above.

#### Section 103 rejections

It is additionally said in the Official Action that some of Applicants' dependent claims are obvious over Ohno as applied to the Applicants' base claims — but also in various more-complex proposed combinations with other cited patents. Since Ohno is shown above to be in a nonanalogous art, relative both to Applicants' claims and to the other cited patents, it is respectfully submitted that the proposed combinations cannot come up to the Applicants' claimed invention.

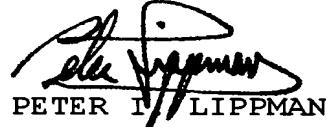
#### Conclusion

In view of the foregoing amendments and remarks, Applicants respectfully request the Examiner's favorable reconsideration and allowance of all the claims now standing in this case.

It is respectfully requested that, should there appear any further obstacle to allowance of the claims herein, the

Examiner telephone the undersigned attorney to try to resolve  
the obstacle.

Respectfully submitted,



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